

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO THE UNITED STATES POSTAL SERVICE
(APWU/USPS-2-8)
(January 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-2 When was the 2010 National Agreement with the APWU ratified? When did its provisions become effective?

APWU/USPS-3 Has anyone at USPS evaluated the combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2010-1, Six-Day to Five-Day Street Delivery and Related Changes? If so, please identify, by name and title, who within the Postal Service conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions

APWU/USPS-4 Has anyone at USPS evaluated combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2011-1, Retail Optimization Initiative, 2011. If so, please identify, by name and title, who within the Postal Service conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions.

APWU/USPS-5 Has anyone at USPS conducted analysis of the potential combined revenue losses and other impacts resulting from instituting all the proposed changes in Docket Nos. N2010-1, N2011-1, and N2012-1? If so, please identify, by name and title, who within the Postal Service, conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions.

APWU/USPS-6 Has anyone at USPS conducted analysis of the impact of the proposed changes in this docket and corresponding service standard changes and the exigent rate increase sought in R2010-4? If so, please identify, by name and title, who within the Postal Service conducted this analysis, describe the analysis, summarize its results and provide all documents related to this analysis and conclusions.

APWU/USPS-7 Assuming the PRC does not issue its decision in this case until August 2012, will the Postal Service implement the Network Rationalize Plan before receiving the benefit of the Commission's advisory opinion in this docket?

APWU/USPS-8 If the Postal Service determines not to move forward with its network rationalization proposal which is the subject of this docket, does the Postal Service intend to implement the Service Standard changes which are the subject of the Federal Register Notice published December 15, 2011 at 76 *Federal Register* 77942?